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9 Michael Grecco Productions, Inc.

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MICHAEL GRECCO
PRODUCTIONS, INC.,

Plaintiff,

v.

TIKTOK, INC.,

Defendant.

Civil Action No. 2:24-cv-04837-FLA-
MAR

**NOTICE OF MOTION AND
MOTION TO STAY RULING
PENDING OUTCOME OF
ELIZABETH WATERMAN
MOTION TO DISMISS**

(UNOPPOSED)

DATE: Friday, October 11, 2024

TIME: 1:30 p.m.

JUDGE: Fernando L. Aenlle-Rocha

PLEASE TAKE NOTICE that, Plaintiff Michael Grecco Productions, Inc.
("Grecco") respectfully moves the Court for an order staying this case pending the
Court's disposition of the August 19, 2024, motion to dismiss in Elizabeth

1 Waterman v. TikTok Inc., Case No. 2:24-cv-04802-AB-AJR (C.D. Cal.) (the
2 “Waterman Lawsuit”), and, in support thereof, states as follows:
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4 1. This lawsuit and the Waterman Lawsuit are substantially similar in
5 that both were filed on the same day, both assert claims of copyright
6 infringement against TikTok with respect to the same alleged conduct, the same
7 counsel has appeared in both actions, and a substantially similar motion to
8 dismiss was filed in both actions.
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11 2. The motion to dismiss in the Waterman Lawsuit was filed on August
12 19, 2024, whereas the motion to dismiss in this action was filed on August 29,
13 2024.
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15 3. For the sake of judicial efficiency and to avoid the potential for
16 inconsistent results within the same District, it makes an abundance of sense for
17 the Court to stay this case until a ruling on the Motion to Dismiss in the
18 Waterman Lawsuit is issued.
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21 4. The undersigned spoke with opposing counsel and they do not oppose
22 that the disposition of the motion to dismiss in the Waterman Lawsuit should
23 apply equally to this case.
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25 5. The requested stay is being made in good faith.

1 **WHEREFORE**, the Plaintiff respectfully requests that the Court enter an
2
3 Order granting this unopposed motion to stay this case pending disposition of the
4 motion to dismiss in the Waterman Lawsuit.

5 **LOCAL RULE 7.3 CERTIFICATE**

6 Before filing this Request, undersigned counsel conferred with counsel for
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8 Defendant (Connor J. Hansen, Esq.) who indicated that he does not oppose the
9 requested relief, therefore, Defendant does not oppose this request.

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11 Dated: October 4, 2024.

COPYCAT LEGAL PLLC

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13 By: /s/ Lauren M. Hausman
14 Lauren M. Hausman, Esq.
15 Attorney for Plaintiff
16 Michael Grecco Productions,
17 Inc.

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on October 4, 2024, I electronically filed the foregoing
20 document with the Clerk of the Court using CM/ECF, which will electronically
21 serve all counsel of record.

22 /s/ Lauren M. Hausman
23 Lauren M. Hausman, Esq.